



ATLANTA

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DAYTON

WASHINGTON, D.C.

July 1, 2020

VIA ECF and Email

The Honorable Vernon S. Broderick  
United States District Court for the Southern  
District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 7/2/2020

Documents 79 and 81 shall remain under seal visible only to  
the selected parties.

Re: *Spectrum Dynamics Medical Limited v. General Electric Company, et al.*, Civil Action No.  
18-cv-11386 (VSB)

Dear Judge Broderick:

We represent General Electric Company, GE Healthcare, Inc., GE Medical Systems Israel Ltd., Jean-Paul Bouhnik, Sergio Steinfeld, Arie Escho, and Nathan Hermony (individually and collectively, “Defendant(s)”), the Defendants in the above referenced matter. On behalf of Defendants, we write pursuant to Rule 5.B of your Honor’s Individual Rules & Practices in Civil Cases to respectfully request permission to file Defendants’ Answer, Affirmative Defenses, and Counterclaims under seal and in redacted form.

By way of background, on December 6, 2018, Plaintiff initiated this action via a complaint that was filed under seal pursuant to an order of the Part I Judge, the Honorable J. Paul Oetken. Plaintiff also filed all of the exhibits to its Complaint under seal.

Then, on May 15, 2019, Plaintiff filed its First Amended Complaint, along with 27 exhibits. As with the initial Complaint, the First Amended Complaint and attached exhibits were filed under seal pursuant to an order issued by this Court—this time signed by your Honor.

Defendants now seek to file under seal their Answer, Affirmative Defenses, and Counterclaims, which, by necessity, quotes from, paraphrases, or describes portions of the First Amended Complaint that Plaintiff filed under seal. In particular, Defendants’ filing identifies and describes the patents that Plaintiff claims disclose Plaintiff’s trade secrets. While Defendants do not believe that any of this material is in fact confidential, they do not want to improperly disclose material that the Court has allowed Plaintiff to file under seal.

For the foregoing reasons, Defendants respectfully request permission from this Court to file their Answer, Affirmative Defenses, and Counterclaim under seal and in redacted form.

4811-4132-8794.1



The Honorable Vernon S. Broderick  
July 1, 2020  
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Respectfully,

A handwritten signature in blue ink, reading "Jesse Jenike-Godshalk".

Jesse Jenike-Godshalk

*Enclosure*

cc: All counsel of record (via ECF and email)